

United States District Court

SOUTHERN

DISTRICT OF

TEXAS

McALLEN DIVISION

UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

Domingo Moran
A202 087 902
United States Citizen

YOB:

PRINCIPAL
1976

United States District Court
Southern District of Texas
FILED

Case Number:

M-14-1753-M

SEP 07 2014

(Name and Address of Defendant)

Clerk of Court

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about September 6, 2014 in Hidalgo County, in the Southern District of Texas defendants(s) did,
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact Maximiliano Hernandez-Hernandez, a national of Mexico, along with two (2) other undocumented aliens, for a total of three (3), who had entered the United States in violation of law, did knowingly transport, or move or attempts to transport said aliens in furtherance of such violation of law within the United States, that is, from a location near Rio Grande City, Texas to the point of arrest near La Joya, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY

I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On September 6, 2014, La Joya Police Officer A. Arriaga, conducted a traffic stop and issued a citation on the driver of a black Chevrolet Tahoe, for impeding the flow of traffic. He requested assistance from Border Patrol in determining alienage on the three passengers. Border Patrol Agents David Haro and Tyler Girodat responded. They encountered the driver, Domingo Moran, a United States Citizen, and three undocumented aliens in the vehicle.

All subjects were transported to the McAllen Border Patrol station.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No


Signature of Complainant

Sworn to before me and subscribed in my presence,

September 7, 2014

Date

Derek Conrow Senior Patrol Agent

Printed Name of Complainant

at McAllen, Texas

City and State

Dorina Ramos

U. S. Magistrate Judge

Name and Title of Judicial Officer


Signature of Judicial Officer

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-14-1753-M

RE: Domingo Moran

A202 087 902

CONTINUATION:

PRINCIPLE STATEMENT:

Domingo MORAN was read his rights. He stated he was willing to provide a statement without the presence of an attorney.

MORAN stated he was on his way to his brother's house to do some yard work for him. While he was pumping gas in Rio Grande City, three men approached MORAN in the need of work. According to MORAN, he told them he would pay the men \$20 each if they helped him do the yard work at his brother's house.

MATERIAL WITNESS STATEMENT:

The material witness was read his rights. He stated he was willing to provide a statement without the presence of an attorney.

Maximilio Hernandez-Hernandez stated he paid \$1,500 (USD) to be smuggled into the United States. After illegally crossing the Rio Grande River, the foot guide told Hernandez and the group he was travelling with, to keep walking until they reached the pickup point. After approximately one hour, they reached thick brush next to a highway. There, they found two men from El Salvador that were not part of Hernandez's group. After a few minutes a black SUV arrived and picked up the two men from El Salvador.

Hernandez stated he did not see the driver at the time, and it seemed to him that the two men from El Salvador knew the truck was there only for them. After an additional 30 minutes, the same black SUV arrived again and picked up Hernandez. According to Hernandez, the driver, who he identified in a photo lineup as MORAN, told Hernandez he had work for him.